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Attorneys for Defendants/Cross-Defendants  
MICHAEL SOMMERS,  
ASSURED AUDIT PEST PREVENTION, LLC and  
ASSURED AUDIT PEST PREVENTION CORPORATION

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ISNEY ECHAVARRIA-PEREZ, individually,

Plaintiff,

v.

MICHAEL SOMMERS, individually;  
ASSURED AUDIT PEST PREVENTION, LLC,  
an Arizona limited liability company;  
ASSURED AUDIT PEST PREVENTION  
CORPORATION, a California corporation;  
DOE DRIVER, individually; MAXWAY  
FREIGHT, LLC, a Utah Limited Liability  
Company; MAXWAY, INC., a Utah  
Corporation; DOES I through X, and ROE  
BUSINESS ENTITIES, XI through XX,  
inclusive,

Defendants.

CASE NO. : 2:25-cv-00063-EJY

**STIPULATION AND ORDER FOR  
DISMISSAL WITH PREJUDICE  
AND FOR GOOD FAITH  
SETTLEMENT**

MAXWAY, INC., a Utah Corporation,

Cross-Claimant,

v.

MICHAEL SOMMERS, individually;  
ASSURED AUDIT PEST PREVENTION, LLC,  
an Arizona limited liability company;  
ASSURED AUDIT PEST PREVENTION  
CORPORATION, a California corporation;  
DOES XX through XXV, and ROE BUSINESS  
ENTITIES XXVI through XXX, inclusive,

Cross-Defendants.

1 IT IS HEREBY STIPULATED AND AGREED, by and between the parties hereto, through  
2 their respective counsel of record, that all claims related to the Complaint and Crossclaim in the  
3 above-entitled matter be dismissed with prejudice, all parties to bear their own costs and attorney's  
4 fees. It is further stipulated and agreed that the settlements entered between the parties are fair, just  
5 and reasonable, and entered into in good faith pursuant to NRS 17.245 and not for the purpose of fraud  
6 or collusion to the detriment of any remaining Defendants.

7  
8 DATED this 17<sup>th</sup> day of July, 2025.

9 GINA CORENA & ASSOCIATES

10  
11 /s/ Mark Rouse

12 \_\_\_\_\_  
13 Mark Rouse, Esq.  
14 Nevada Bar No. 12273  
300 S. Fourth Street, Suite 1400  
Las Vegas, Nevada 89101  
*Attorneys for Plaintiff Isney Echavarria-Perez*

DATED this 17<sup>th</sup> day of July, 2025.

ROGERS, MASTRANGELO, CARVALHO &  
MITCHELL

11 /s/ Stephen H. Rogers

12 \_\_\_\_\_  
13 Stephen H. Rogers, Esq.  
14 Nevada Bar No. 5755  
700 South Third Street  
Las Vegas, Nevada 89101  
*Attorneys for Defendants*  
*Michael Sommers, Assured Audit Pest*  
*Prevention, LLC and Assured Audit Pest*  
*Prevention Corporation*

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16  
17 DATED this 17<sup>th</sup> day of July, 2025.

18 WINNER & BOOZE

19  
20 /s/ John R. Hawley

21 \_\_\_\_\_  
22 John R. Hawley, Esq.  
23 Nevada Bar No. 1545  
1117 South Rancho Drive  
Las Vegas, Nevada 89102  
*Attorneys for Defendant Maxway, Inc.*

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

Date: July 17, 2025

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